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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

| | | |
|---|---|---------------------------------|
| CRIMINAL PRODUCTIONS, INC., a Nevada corporation, |) | Case No.: 2:16-cv-01968-RFB-CWH |
| Plaintiff, |) | |
| vs. |) | |
| KELLI HOFFMAN; TEGAN LEWIS; |) | |
| Defendants |) | |

[PROPOSED] JUDGMENT AND PERMANENT INJUNCTION

This matter comes before the Court upon motion by CRIMINAL PRODUCTIONS, INC. ("Plaintiff") for a default judgment against defendants KELLI HOFFMAN and TEGAN LEWIS for failure to answer or otherwise defend against the Plaintiff's First Amended Complaint [Doc. No. 7]. This Court, having considered the motion, Plaintiff's memorandum of law in support of its motion, and the supporting Declaration of Charles C. Rainey, Esq., with accompanying exhibits, together with the pleadings, records, and papers filed herein, and any arguments made at the hearing of this matter, if any, concludes that the motion should be granted and enters the following JUDGMENT:

The Clerk of the Court, noting the failure of Defendants KELLI HOFFMAN and TEGAN LEWIS to Answer or otherwise respond to the Plaintiff's Complaint or First Amended Complaint, as on file herein, has issued and entered into the record Default against each of the foregoing Defendants (Doc No. 39.)

Defendants KELLI HOFFMAN and TEGAN LEWIS, and each of them, willfully infringed Plaintiff's rights in violation of 17 U.S.C. §§ 101 *et seq.*

The conduct of Defendants KELLI HOFFMAN and TEGAN LEWIS was willful, intentional, and in disregard of and indifferent to Plaintiff's rights, and such conduct caused harm to Plaintiff and deprived Plaintiff of income.

1 Upon this record, the Court adjudges and decrees as follows:

2 1. The Court hereby **AWARDS** statutory damages to the Plaintiff against
3 Defendant KELLI HOFFMAN, in the amount of \$15,000 pursuant to 17 U.S.C. § 504.

4 2. The Court hereby **PERMANENTLY ENJOINS** Defendant KELLI
5 HOFFMAN from directly or indirectly infringing Plaintiff's rights as to the motion picture
6 *CRIMINAL*, including without limitation using the Internet to reproduce, to distribute, to copy, or
7 to publish *CRIMINAL*, except pursuant to a lawful license from Plaintiff.

8 3. The Court hereby **ORDERS** Defendant KELLI HOFFMAN to delete any
9 unlicensed copy of the motion picture *CRIMINAL* in Defendant's possession or control.

10 4. The Court hereby **ORDERS** Defendant KELLI HOFFMAN to refrain from
11 knowingly and willfully using the BitTorrent network or the Internet for copying or downloading
12 content in violation of U.S. copyright law.

13 5. The Court hereby **AWARDS** statutory damages to the Plaintiff against
14 Defendant TEGAN LEWIS, in the amount of \$15,000 pursuant to 17 U.S.C. § 504.

15 6. The Court hereby **PERMANENTLY ENJOINS** Defendant TEGAN LEWIS
16 from directly or indirectly infringing Plaintiff's rights as to the motion picture *CRIMINAL*,
17 including without limitation using the Internet to reproduce, to distribute, to copy, or to publish
18 *CRIMINAL*, except pursuant to a lawful license from Plaintiff.

19 7. The Court hereby **ORDERS** Defendant TEGAN LEWIS to delete any
20 unlicensed copy of the motion picture *CRIMINAL* in Defendant's possession or control.

21 8. The Court hereby **ORDERS** Defendant TEGAN LEWIS to refrain from
22 knowingly and willfully using the BitTorrent network or the Internet for copying or downloading
23 content in violation of U.S. copyright law.

24 **IT IS SO ORDERED AND ADJUDGED.**

25 Signed on this 29th day of March, 2018, at Las Vegas, Nevada.

26
27 By: _____



28 RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE